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**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON**

In re:

GIGA WATT, Inc., a Washington
corporation,

Debtor.

Case No. 18-03197 FPC 11

The Honorable Frederick P. Corbit

Chapter 11

**CHAPTER 11 TRUSTEE'S EX
PARTE MOTION FOR RULE 2004
ORDER**

Mark D. Waldron, in his official capacity as the Chapter 11 Trustee (the
“**Trustee**”), hereby moves the Court for an *ex parte* order directing Perkins Coie
LLP (“**Perkins Coie**”) to produce to the Trustee at the offices of Potomac Law
Group, PLLC, 1905 7th Ave. W, Seattle, WA 98119 the documents described in
Exhibit A hereto on or before Tuesday, July 14, 2020 at 12:00 p.m.

The purpose of the examination is to inquire into certain facts and
circumstances surrounding Giga Watt’s “Initial Coin Offering” that it conducted
jointly with Giga Watt Pte. Ltd and a second affiliate, Cryptonomos Pte. Ltd.

1 Additional information regarding that public offering is set forth in the Trustee's
2 Interim Report dated July 2, 2020.

3 This Motion is brought pursuant to 11 U.S.C. § 105, Rule 2004 of the
4 Federal Rules of Bankruptcy Procedure and Rule 2004-1 of the Local Bankruptcy
5 Rules of this Court.

6 This Motion is without prejudice to the Trustee's right, and the Trustee
7 expressly reserves the right, to request further documents and an examination
8 pursuant to further Order of this Court.

9 Dated: July 3, 2020

POTOMAC LAW GROUP PLLC

10 By: /s/ Pamela M. Egan
11 Pamela M. Egan (WSBA No. 54736)

12 *Attorneys for Mark D. Waldron, Chapter 11*
13 *Trustee*

14 **CERTIFICATION OF CONFERRAL**

15 Pursuant to L.B.R. 2004-1, I hereby certify that on behalf of the Trustee that
16 I attempted to coordinate the time and place of the production requested herein by
17 sending the letter attached hereto as **Exhibit B**. Perkins Coie L.L.P. declined the
18 request, as also set forth in **Exhibit B**.

19 Dated this 3rd day of July 2020.

20 /s/ Pamela M. Egan
21 Pamela M. Egan (WSBA No. 54736)

22 *Attorneys for Mark D. Waldron, Chapter 11*
23 *Trustee*

24 4825-8593-4017, v. 1

25 Chapter 11 Trustee's *Ex Parte* Motion for Rule 2004 Order - Page 2